Open 21, Inc.

On-Line Public Educational Network for the 21st Century, Inc.

1701 K Street, N.W. Suite 800 Washington, DC 20006 202-835-8979

July 17, 2000

RECEIVED

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AND OF THE SECRETARY

Magalie Roman Salas, Secretary Federal Communications Commission The Portals 445 Twelfth Street, S.W. TW-A325 Washington, DC 20554

Dear Ms. Salas:

Enclosed please find an original and four copies of a Petition for Rule Making to amend the Television Table of Allotments to substitute channel 15 at Ann Arbor, Michigan for channel 58 at Ann Arbor, Michigan. Open 21, Inc. is an applicant for this facility (BPTTL- 19960920WC) and this petition is filed in order to break mutual exclusivity between this application and a DTV television facility.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Thomas Cohen

President

Lr/tv/open21/ann arbor 15 cover letter

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FED FRAL C	Before the COMMUNICATIONS COMMISSION	N PECE.
1 == 2= 0	Washington, D.C. 20554	N MECEIVED
In Re:)	COMPANICATIONS COMPANICATIONS COMPANICATIONS
Amendment of Section 73.606(b))	WAY TON
of the Commission's Rules, the) RM-	
Table of Allotments for Analog)	
Television Broadcast Stations)	
(Ann Arbor, Michigan))	

To: Chief, Allocations Branch Mass Media Bureau

PETITION FOR RULE MAKING

On-Line Public Educational Network for the 21st Century, Inc. ("Open21") applicant for a new non-commercial full power analog television station on Channel 58 at Ann Arbor, Michigan (the "Applicant"), 1 pursuant to Section 1.401 of the Commission's rules, 47 C.F.R. § 1.401, and the Commission's Public Notices regarding a window for filing petitions for rule making to change analog television allotments that may conflict with digital television ("DTV") station allotments, authorizations, applications, or rule making proposals, 2 hereby petition the Commission to amend the Table of Allotments for analog television broadcast stations to substitute Channel 15 for Channel 58 at Ann Arbor, Michigan, and to authorize the Applicant to amend its pending application for Channel 58 to specify operation on Channel 15 without subjecting its

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The Applicant is On-Line Public Educational Network for the 21st Century, Inc. ("Open21") (File No. BPET-19960920WC).

See Public Notice, Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations, DA 99-2605 (released November 22, 1999)(the "Amendment Public Notice"); see also, Public Notice, Window Filing Opportunity For Certain Pending Applications and Allotment Petitions for New Analog TV Stations Extended to July 15, 2000, DA 00-536 (released March 9, 2000).

application to competing applications. In support of this petition for rule making, the Applicant submits the following:

- 1. The Applicant has tendered for filing and has pending an application for a construction permit for a new non-commercial analog television station on Channel 58, Ann Arbor, Michigan. Since the reference coordinates for the proposed transmitter site are within the minimum co-channel separation distance for Zone I of 154.5 miles (or 248.6 kilometers) from Detroit, Michigan, one of the 30 designated television markets subject to the Commission's freeze in the advanced television ("ATV") proceeding (i.e., an "ATV freeze zone"), the Applicant specified a transmitter site outside of, and/or requested a waiver of, the ATV freeze in their respective applications.
- 2. In the DTV proceeding, the Commission stated that it would open a filing window, announced by Public Notice, during which pending analog full power television applications in an ATV freeze zone that would conflict with a DTV station allotment, authorization, application or rule making proposal could be amended to eliminate the DTV conflict, or could file a petition for rule making for an alternate channel below Channel 60 if necessary to avoid the DTV conflict. The Amendment Public Notice implements this Commission decision, permitting ATV freeze area applicants to file a petition for rule making to substitute a new channel below Channel 60.5

See Advanced Television Systems, Mimeo No. 4074, 52 Fed. Reg 28346 (1987).

See Advanced Television Systems and Their Impact on the Existing Television Broadcast Service, MM Docket No. 87-268, Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders, FCC 98-315, 13 FCC Rcd 23992, 14 CR 674 at ¶¶ 40-42 (1998) (the "DTV Second MO&O").

See Amendment Public Notice at 4-6.

- The Commission stated that it would require ATV freeze applicants to demonstrate that interference to a DTV station allotment, authorization, application or rule making proposal would be caused if the proposed channel substitution is not made.⁶ As demonstrated by the attached Engineering Report,⁷ the Applicant's analog Channel 58 application proposals would cause interference to the DTV Channel 57 allotment for WILX at Onandaga, Michigan, to the DTV Channel 58 allotment for WJBK at Detroit, Michigan, DTV Channel 58 allotment for WCMV at Cadillac, Michigan, and DTV Channel 59 allotment for WLNS at Lansing, Michigan.⁸
- 4. The Commission also stated that applicants with pending full power analog applications subject to the ATV must propose a single alternate channel below Channel 60.9
- 5. As required by the Amendment Public Notice and Sections 73.610 and 73.623(c) of the Commission's rules, 47 C.F.R. §§ 73.610 and 73.623(c), the Engineering Report demonstrates that the proposed allotment of Channel 15 to Ann Arbor, Michigan, meets all legal and technical requirements, including the minimum distance separation requirement to all other analog television stations, and protects all DTV stations with allowances for *de minimis* interference. 12
 - 6. This proposal is short-spaced to WGTE, Channel 30, at Toledo, Ohio, and to

See <u>DTV Second MO&O</u> at ¶ 42; see also, Amendment Public Notice at 4.

See Engineering Report dated July 2000 and prepared by Venture Technologies Group, LLC, attached hereto as Exhibit A (the "Engineering Report").

See Engineering Report.

See <u>DTV Second MO&O</u> at ¶ 42; see also, Amendment Public Notice at 5.

See Amendment Public Notice at 5.

See Engineering Report.

See Engineering Report.

WANE-TV, Channel 15 at Fort Wayne, Indiana. However, no interference will be caused to either WGTE or WANE-TV by this proposal. Therefore, the Applicant requests a waiver of Section 73.610(d), Table 2 of Section 73.698, and other applicable Rules and Regulations of the Federal Communications Commission.

- 7. The Applicant hereby states its present intention to amend its pending application to specify operation on Channel 15, if analog Channel 15 is substituted for Channel 58, during the time period specified by the Commission in its allotment order, as required by the Commission.¹³
- 8. The Applicant submits that grant of this petition for rule making and the substitution of analog Channel 15 for Channel 58 at Ann Arbor, Michigan, would serve the public interest by permitting the initiation of a new noncommercial television service serving Ann Arbor, Michigan, and surrounding communities, without causing interference to any other existing station or any DTV station allotment, authorization, application or petition for rule making. Therefore, the public interest would be served by the grant of this petition.
- 9. Wherefore, the above premises being considered, the Applicant requests that the Commission grant this petition for rule making, amend Section 73.606(b), the Table of Allotments for analog television broadcast stations, to substitute Channel 15 for Channel 58 at Ann Arbor,

See <u>DTV Second MO&O</u> at ¶ 42; see also, Amendment Public Notice at 6.

Michigan and authorize the Applicant to amend its pending application for Channel 58 at Ann Arbor, Michigan to specify operation on Channel 58 without subjecting its application to competing applications.

Respectfully submitted,

Open21, Inc.

Thomas W. Cohen, Esq.

President

1701 K Street N.W., Suite 800 Washington, D.C. 20006 (202) 835-8979 telephone (202) 833-9536 facsimile

CERTIFICATE OF S ERVICE

I, Thomas Cohen, hereby certify that on this 17th day of July, 2000, an original and four copies of the foregoing "Petition for Rulemaking" have been served by hand upon the following:

Magalie Roman Salas, Secretary Federal Communications Commission The Portals 445 Twelfth Street, S.W. TW-A325 Washington, DC 20554

And additional copies have been served by hand delivery or first class mail, postage prepaid, upon the following:

Clay Pendarvis, Chief Television Branch Federal Communications Commission 445 12th Street, S.W., Room 2-A662 Washington, D.C. 20554

John A. Karousos, Chief Allocations Branch Federal Communications Commission 445 12th Street, S.W., Room 3-A320 Washington, D.C. 20554

Thomas Cohen

Venture Technologies Group, LLC Technical Consultants

ENGINEERING REPORT PETITION FOR RULE MAKING TO AMEND SECTION 73.606(b) OF THE FCC RULES BY SUBSTITUTING **UHF-TV NTSC CHANNEL 15 FOR CHANNEL 58** AT ANN ARBOR, MICHIGAN

JULY 2000

This engineering report has been prepared on behalf of On-Line Public Educational Network for the 21st Century, Inc. ("Applicant"), an applicant for a new analog NTSC television station Channel 58 at Ann Arbor, Michigan, in support of its petition for rule making to amend Section 73.606(b) of the FCC Rules and Regulations to substitute analog Channel 15 for the analog Channel 58 allotment for Ann Arbor, Michigan. The Applicant's Channel 58 application at Ann Arbor, Michigan (FCC File No. BPET-19960920WC) is mutually exclusive with the DTV allotment on Channel 57 for WILX-DT at Onandaga, Michigan; the DTV allotment for Channel 58 for WJBK-DT at Detroit, Michigan; the DTV allotment for Channel 58 WCMV-DT at Cadillac, Michigan; and the DTV allotment for WLNS, Channel 59 at Lansing, Michigan. Figure 1 illustrates the signal overlap of these facilities. Table 1 shows the allocation situation for the Applicant's proposed facility on Channel 58.

Since widespread interference would otherwise occur, the Applicant proposes to amend the FCC Rule Section 73.606(b) as follows:

Section 73.606(b) Substitute NTSC Channel 15Z for Channel 58.

The reference coordinate for the proposed new allotment at Ann Arbor, Michigan, would be as follows:

42 degrees, 27', 38" N. Lat., 83 degrees, 12', 50" W. Long.

The directional transmitting antenna and antenna orientation for the proposed new allotment at Ann Arbor, Michigan, would be as follows:

Andrew ALP24L3-HSNR-15 oriented 260 degrees true north.

The ERP for the proposed new allotment at Ann Arbor, Michigan remains the same that is in the Applicant's Channel 58 application. The proposed ERP for use with the allotment would be:

500 kW

with an antenna height above average terrain of :

308 meters.

Table 2 shows the allocation situation for the proposed NTSC Channel 15 allotment.

This proposal is short-spaced to WGTE, Channel 30, at Toledo, Ohio, and to WANE-TV, Channel 15 at Fort Wayne, Indiana. However, no interference will be caused to either WGTE or WANE-TV by this proposal. Therefore, the Applicant requests a waiver of Section 73.610(d), Table 2 of Section 73.698, and other applicable Rules and Regulations of the Federal Communications Commission.

A study of predicted interference caused by the Applicant's proposed television service on Channel 15Z at Ann Arbor, Michigan, using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's Fortran-77 code was modified by RadioSoft for use its software program ComStudy 2.2 for operation on a Windows NT platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The

effect of any variance in calculated population values versus the FCC's program is minimized when analyzing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 square kilometers using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

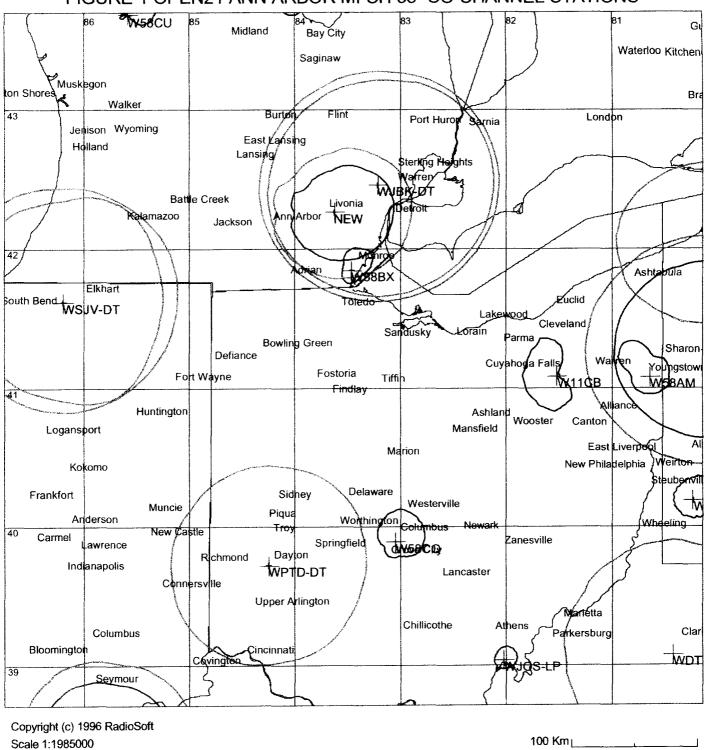
The baseline for the proposed new TV facility: No station on Channel 58.

Proposed Change: Channel 15Z, Andrew ALP24LE-HSNR-15 antenna oriented toward 260 degrees true north, Channel 15, 500 kW ERP, 308 meters HAAT, 42 degrees, 27', 38" N. Lat., 83 degrees, 12' 50" W. Long.

The results are depicted in Table 2 and comply with Commission policy and rules.

Based on the Commission's Public Notice, released June 2, 2000 (DA 00-1224) and the latest FCC CDBS data base, there are no Class A low power television status stations that conflict with the proposed Channel 15 allotment.

FIGURE 1 OPEN21 ANN ARBOR MI CH 58 CO CHANNEL STATIONS



State Borders — Lat-Lon Grids

TV Grade 'A'

TV Grade 'B'

Cəllsign	City	Class	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adij	Matrix	Svi: Contour	Svc Strength Int Contour	Int Strength	Matrix Analys Old Pop%	New Pop%	Total Pop	Old Pop	New Pop
CBEFT	Laura Donn			-				,						·										
CHCH-TV2	WINDSOR LONDON	Anako	138.000	D/M	cliene	57.1	A.C	76.5 76.5		0.0	0.0	1	UHF	54 Z	T-4	UR	F(50.50)	64			12	1414264	1414264	1401173
CICOTV59	CHATHAM	Analog	1300.000	D/M	Set c	158.7	A).	*G *	-33	0.0	6.0	2	UHF	51 +	T-7	LR	F(50.50)	64 -	<u> </u>	N ·	*4.7,	N/C	N/C	N/C
NEW	ANN ARBOR	Analog	37.200	O/M	i a	128.8	W.	38 - 1	-15	0.0	6.0	1	UHF	59.2	A+1	LR	F(50,50)	64	·	ta.,	Fig. 5	N/C	N/C	N/C
NEW	BAY CITY		2880.000	D/M		0.0			45	0.0	6.0	1	UHF	58+	Co	LR	F(50.50)	64	ļ	ļ		3708876	3708876	38469
NEW	BAY CITY	Analog Analog	5000.000	D/M D/M	ا سمار ۲	135.6		(11)	-34	0.0	6.0	1	UHF	61 +	T+3	LR.	F(50.50)	64 -	<u> </u>	1	-	1244768	1244768	1244768
NEW	DEFIANCE	1	5000,000	D/M	0.500	137.0	ļ.,		-34	0.0	6.0	<u> </u>	UHF	61+	T+3	LR	F(50.50)	64	 	-	1997	2163839	2163839	2163839
NEW	YOUNGSTO		5000.000	D/M	Const.	127.3	*	10:	-33	0.0	6.0	1		65+	7+7	UR.	F(50,50)	64		ļ	1.75	1336569	1335569	1336569
WBNXTV		Analog	5000.000	D/M		315.5	34.7	0.0	28	0.0	6.0	1	UHF		Co	LR	F(50,50)	64	ļ	1-7.7		2169064	2169064	2168249
WCMV-DT		DTV	50.000	D/M	ೆಹಳ 	187.8	1.50	1953	-33	0.0	14.0	1	UHF	56-	7-3	LR	F(50,50)	64	 	 	11 13	3582261	3582261	3582261
WCMV-DT		DTV	50.000	D/M	₹35-a	2507	Naci	10.7	2	10.0	<u> </u>	2	4	58 58	Co	LR	F(50,90)	41 -	 	1		137284	137284	136789
VTTLOW	MILWAUKEE		5000.000	D/M	Makinari Makinari	250.7 365.1	1,44	25 -	2	0.0	14.0	-	UHF	196	Co	LR LR	F(50,90) F(50,50)	64	-		1.3.6	137284	137284	136789
WFFTTV	FORT WAY		603.000	D/M		183.0	-	- N: 1	20		<u> </u>	ļ <u>.</u>	4	56.7	Co			64	┼		177	2324281	2324281	2324281
WILX-DT	ONONDAGA		947000	D/M	Paul	80.5	 	10.00	-33 -48	10.0	6 0 14.D	 	UHF	55 Z	T-3 A-1	LR LR	F(50.50) F(50.90)	41	 	1000	F	641029 2395029	641029 2396029	641029 2129687
WILX-DT	ONONDAGA		1000.000	D/M	 	80.5	 		-48 -48	10.0	14.0	 	UHF	67	A-1	LR		[2395029		
WILX-DT	ONONDAGA		1000.000	D/M		80.5			-48	10.0	14.0	1	UHF	67	A-1	LR	F(50,90)	41		1	+		2448694	2170971
WJBK-DT		DTV	1000.000	D/M	<u> </u>	40.4	 	 	2	10.0	14.0	<u> </u>	UHF	58		LR	F(50.90)	41	ļ-		-	2431978	2431978	2156854
WJBK-DT		OTV	1000.000	D/M	ļ	40.4	 	-	2	10.0	14.0	 	UHF	50	Cu	UR UR	F(50,90)	41	·		 	5603823	5603823	4395608 4395608
WJBK-DT		DTV	1000.000	D/M	ļ	40.4						 		DR	Cn		F(50,90)		-	 		5603823	5603823	
		DTV	3.800	D/M		295.0		F10	2	10.0	14.0	1	UHF	50	Co	LR LR	F(50,90)	141		-	+	5480543	5480543	4288161 392022
		DTV	50.000	D/M	Com in		1/4	3,"	2	10.0	14.0	 	UHF	56	Co	LIR	F(50.90)	41	<u> </u>			395394	395394	
		DTV	50,000	D/M	Copyri	295.1 295.1	2945	911 -01	2	10.0	14.0	ļ	UHF	58	Co		F(50.90)	41	Ţ		10.00	487416	487416	483164
<u> </u>		Analog	2340.000	D/M	dana.	<u> </u>	7.80	201	-32	10.0	4	 	UHF	DO	Co	LR LR	F(50.90)	64	<u> </u>	 		511567	511567	507993
WKBD		Analog	5000.000	D/M	Classo	35.6 35.6		 	-32	0.0	6.0 6.0	 	UHF	50 -	T-8	LR	F(50.50)	64	 	1	-	4846112 5012953	4846112	4843737 5010673
WLNS-DT		DTV	916.000	D/M	1 (8) (1)	77 7	ļ``	1511	-49	10.0	14.0	 	UHF	50-	A+1	LR	F(50,90)	1	 	V.	1,124	2990522	5012953 2990522	2689130
WLNS-DT		DTV	1000.000	D/M		77.6	-		-49	10.0	14.0	- 	UHF	50	A+1	UR UR	F(50.90)	41	-	ļ		3336000	3336000	2981926
WLNS-DT		DTV	1000.000	D/M		77.6	 		49	10.0	14.0	 	UHF	28	A+1	LR	F(50,90)	41	-	 	_	3283637	3283637	2940591
WPTD-DT		DTV	104.000	D/M	CService	287.2	120		49	10.0	14.0	 	UHF	60	Co	LR LR	F(50,90)	41	ļ	 	 	3012292	3283637	3007157
		DTV	104.000	D/M	1 382 m	287.2	24.1	40.7	2	10.0	14.0	 	UHF	50	Ca	LR	F(50,90)	41	-	1007		3012779	3012292	3007157
	CLEVELAND		2000.000	D/M	Carrai	187.4	 	155,4	-34	0.0	6.0	 	UHF	61 Z	T+3	LR	F(50,50)	64	┼	107.0	17.7	3418692	3418692	3416692
	CLEVELAND		5000.000	D/M	Ciesa	187.4	1	1554	-34	0.0	6.0	- 	UHF	61 Z	T+3	LR.	F(50,50)	64	-	1		3534095	3534095	3534095
		DTV	358.000	D/M	K Street	224.8	1	1054	2.00	10.0	14.0	-	UHF	60	Co	LR	F(50.90)	41	-	1	-	1433371	1433.371	1426932
WSJV-DT	ELKHART	DTV	358.000	D/M	Chris	224.6	 	 	-	10.0	14.0	1,	UHF	56	Co	UR UR	F(50,90)	[3.5	1 22	1260290	1260290	1260290
WSJV-DT	ELKHART	οτ∨	797.000	D/M	Cicio	224.8	 	 	2	10.0	14.0	1	UHF	58	Co	LR.	F(50,90)	41	 	 		1582599	1582599	1581622
		Analog	1170.000	D/M	Chesti Chesti	112.1	157	80 t	-41	0.0	6.0	12	UHF	66.	T+8	LR.	F(50,50)	64	-	la l	0.03	1309066	1309066	1309066
WSMH		Analog	5000.000	D/M	Charle	112.1	100	ACL S	-41	0.0	6.0	1 -	UHF	66	T+8	LR.	F(50,50)	64	- [ne:	15.00	1699607	1699607	1699607
WTLW		Analog	912.000	D/M	Carac	173.0	16	77	-25	0.0	0.0	1	UHF	44+	T-14	LR.	F(50,50)	64	-	010	6.77	488663	488563	488563
WTVS		Analog	2090,000	D/M	Ciene	35.6	37	846	-26	0.0	6.0	1	UHF	56 Z	T-2	I.B	F(50.50)	64	1.	100	8.2.	4812031	4812031	4755448
wrvs		Апаюд	5000.000	D/M	Cteran	35.6	30	8.6	-26	0.0	6.0	1	UHF	56 Z	T-2	I.R	F(50,50)	64	 	Lance .	2,020	5005580	5006580	4974917
WUAB		Analog	4680.000	D/M	S Stenario	186,3	100	4:1	-#	0.0	0.0	1 -	UHF	43 Z	T-15	LR.	F(50,50)	64	 	 	1000	3401284	3401284	3401284
WUAB		Anakog	5000.000	D/M	Cleran	186.3	12	by 1	-9	0.0	0.0	· 	UHF	43 Z	T-15	I.R	F(50,50)	64	-	1 100	is an	3601264	3601254	3601254
WVPX-DT		DTV	449.000	D/M	Cien	216.1	10.65	110 1	-49	10.0	14.0	1	UHF	59	A+1	LR.	F(50,90)	41	+	6 (r):	0.65	4116026	4116026	4116026
WVPX-DT	AKRON	DTV	449.000	D/M	Citien	216.1	100	1961.1	49	10.0	14.0	1	UHF	59	A+1	LIR.	F(50,90)	41	+	1 (157)	C 180	4108909	4106909	4108909
WVPX-DT	AKRON	DTV	1000.000	D/M	Carps	216.0	1(3)	1100	-49	10.0	14.0	1	UHF	59	A+1	LR.	F(50,90)	41	+	000	Orbs	4138706	4138706	4138706
VTLWW	DETROIT	Analog	1000.000	0	Они	43.6	10	1116	ļ. —	1	+	1	UHF	62 Z	T+4	UR.	(00.00)	[N/C	N/C	N/C	N/C	N/C
WWJTV	DETROIT	Analog	5000.000	D.	Claric	42.6	10	16.6	 	-	+	1	UHF	62 Z	T+4	LR	+	 	+	N/C	N/C	N/C	N/C	N/C
WZPX	BATTLE CRI		5000.000	D/M	Const	127.1	1241	7.1	-9	0.0	0.0	1	UHF	43.	T-15	UR.	F(50,50)	64	+	1.0	Diffe.	1902792	1902792	1902724
·			L	L	Townson.	T.,	1::	1	1	<u>r~</u>		<u></u>	Γ'''	Γ	I	T.,	[(00,00)	<u>rr</u>	<u> </u>	.11"		1302132	1002/02	

TABLE 2: NTSC AND DTV UHF TV ALLOCATION STUDY FOR DTV CHANNEL 15 AT ANN ARBOR, MICHIGAN

ComStudy 2.2 RadioSoft

Callsign	City	Class	ERP	Sep Type	Status	Dist	Prot	Cloaranco	D/U	Rx Gain	Rx F/8	Zone	Band	Ch#	Adj	Matrix	\$vc Contour	Svc Strength	Int Contour	int Strength	Matrix Analys	Old Pop%	New Pop%	Total Pop	Old Pop	New Pop
ALC	SARNIA	Analog	10.000	ID/M	1	87.3	T13	Top :	-29	la a	6.0	1.	J UHF	17+	T+2	Turk	F(50.50)	64		······	,		T	76035	76035	76035
CHWITY		Arialog	492.000	D/M	Oteres:	72.5	13	5£ 3	-15	0.0	6.0	<u> </u>		16-	A+1	LR	F(50,50)	64				No. 1	Notice Notice	N/C	N/C	N/C
CICOTV18	LONDON	Anaiou	38.300	D/M	Carre Carre	161.9	<u> </u>	090	-34	0.0	6.0	1	UHF	18 2	T+3	LR.	<u> </u>	64			1	1911	No. 2	N/C	N/C	N/C
CIITV22	STEVENSO		794,000	D/M	Distanta	74.7	<u> </u>	1 ****		0.0	6.0	1		22 -	7+7	LR	F(50.50)	64	· ·	·			N. C.	N/C	N/C	N/C
CIITTV29	SARNIA-OIL	Analog	370.000	D	1	90.7	 	 		0.0		1	UHF	29+	T+14	UR .	1.	-				N/C	N/C	N/C	N/C	N/C
WANETV	FORT WAY!	Analog	437.000	D/M	Char	223.1		 	28	0.0	6.0	1	UHF	16.	Co	LR .	F(50.50)	64				10	0.00		553989	553989
WCMUTV	MOUNT PLE	Analog	204.000	D/M	Clear	177.3	88	80 3	-15	0.0	6.0	2	UHF	14 2	A-1	LR	F(50.50)	64				(* 1.5°)	() Cory		243732	243732
WDCP-DT	BAD AXE	עדע	50.000	D/M	Cleur	138.4				100	14.0	2	UHF	15	Co	LR.	F(50.90)	41		-		(65)	g 15,	132788	132768	132593
WDCP-DT	BAD AXE	OTV	50,000	D/M	Olean	138.4		 	2	10.0	14.0	2	UHF	15	Co	LR	F(50,90)	41			<u> </u>	070~	(0.2%)	133104	133104	132968
MDCQ	UNIVERSITY	Analog	1290.000	D	Okty	137.4	¥	RF 4				2	UHF	19+	T+4	LR	-	-			1	N/C	N/C	N/C	N/C	N/C
WEWS-DT	CLEVELAND	ρτν	500.000	D/M	Cityen	173.1	 		2	10.0	14.0	1	UHF	16	Co	LR.	F(50,90)	41				0.00	0.0%	3647363	3647363	3647250
WEWS-OT	CLEVELANO	DTV	1000.000	D/M	Care.	173.1	 	 	2	10.0	14.0	1	UHF	15	Co	LIR.	F(50.90)	41	-	-		GO2-	o tsi.	4048220	4048220	4043537
WEWS-DT	CLEVELAND	στν	1000.000	D/M	Diegr	173.1	 	1	2	10.0	14.0	1	UHF	15	Co	UR.	F(50.90)	41		 	1	gira.	() 19x	4006396	4006306	4003450
WGTETV	TOLEDO	Analog	1000.000	D		91.0	1	 	-			1	UHF	30+	T+15	UR.	<u> </u>				1	N/C	N/C	N/C	N/C	N/C
WHT∨	JACKSON	Analog	8.910	D/M	Citien	100.9	æ.	6 8-9	-34	0.0	6.0	1	UHF	18+	T+3	LR	F(50,50)	64		-		(4) 6	0.00%	140447	140447	140447
WKARTV	EAST LANS	Analog	1230.000	D/M	Ciese	102.1	SZ.	70.1	-41	0.0	6.0	1	UHF	23 -	T+8	LR	F(50,50)	64	-			Lo.	N164	1250950	1250950	1260960
WKBD-DT	DETROIT	DTV	50.000	D/M	Сязы	8.5	1	1	-48	10.0	14.0	1	UHF	14	A-1	UR.	F(50,90)	41	-			.16	994	4787310	4787310	4787310
WK8D-DT	DETROIT	DTV	50.000	D/M	Clean	8.5	†	1	-48	10.0	14.0	1	UHF	14	A-1	LR	F(50,90)	41		-	1	(19%)	6.03	4814653	4814653	4814653
WKBD-DT	DETROIT	DTV	58.700	D/M	Caso	8.5			-48	10.0	14.0	1	UHF	14	A-1	LR	F(50,90)	41	-			(17%)	0.0%	4675754	4575754	4575754
	SHAKER HE	Analog	3720.000	D	Cases	173.4	32	549.4			-	1	UHF	19 Z	T+4	LR	·	-	•	·		N/C	N/C	N/C	N/C	N/C
WPSX-0T	CLEARFIELD	DTV	1000.000	D/M	Carri	423.6	245	F75(4)	2	10.0	14.0	1	UHF	15	Co	LR	F(50.90)	41	-	·		(ith)	50%	762961	762961	762961
WPSX-DT	CLEARFIELD	DTV	1000.000	D/M	Qea	423.6	245	1781)	2	10.0	14.0	1	UHF	15	Co	LR.	F(50,90)	41	-	-		0475	0.0%	825955	825955	825955
WSMH-DT	FLINT	DTV	60.000	D/M	Ühver	108.9	5/h.	20	49	10.0	14.0	1	UHF	16	A+1	LR	F(50.90)	41				tjess	Gara	1490312	1490312	1490312
WSMH-DT	FUNT	DTV	60.000	D/M	Glesn	108.9	t.)(j	2-9	-49	10.0	14.0	1	UHF	16	A+1	LR.	F(50.90)	41				G Cr	60%	1502979	1502979	1502979
		DTV	1000.000	D/M	Ghort.	108.9	1(5)	2.9	49	10.0	14.0	1	UHF	16	A+1	UR	F(50,90)	41		<u> </u>		d.v.	0.00	2007598	2007598	2007497
	PARKERSBI		234.000	D/M	Coleman.	372.3	327)	46.3	28	0.0	6.0	1	UHF	14, .	Co	LR	F(50.50)	64		-		gar is,	6 (Z)	262491	262491	262491
	GRAND RAI		1290.000	D/M	Calesin	192.0	35	1800	-29	0.0	6.0	1	UHF	17-	T+2	rus .	F(50,50)	64	-			(\$40°).	\$ 0%.	1398817	1396817	1398817
WXM	GRAND RAI	Analog	5000.000	D/M	Gles n ·	192.0	3/	1(0,0	-29	0.0	6.0	1	UHF	17 -	T+2	LR.	F(50,50)	64	-			9.4	0.0%	1855493	1855493	1855493